**United States Bankruptcy Court**
**Eastern District of Michigan**
**Southern Division**

In Re: Lisa Kratt

Case No. 16-47370
Chapter 13
Judge: RANDON

Debtor(s)
______________________________

WILLIAM D. JOHNSON (P54823)
BRIAN D. RODRIGUEZ (P57194)
ACCLAIM LEGAL SERVICES, P.L.L.C.
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(248) 443-7033
______________________________/

Debtor's Chapter 13 Confirmation Hearing Certificate
[To be completed fully]

At the next confirmation hearing in this case, the debtor intends to: [Check ONE of the following]

1. ___ Request confirmation of the debtor's plan, because all timely objections of creditors and the trustee have been resolved. I have emailed to the trustee a proposed order confirming the plan, as required in paragraph 2 of the Chapter 13 Case Management Order.

2._X__Request confirmation of the debtor's plan, even through all timely objections have not been resolved. I have e-mailed to the Trustee a proposed order confirming the plan, as required in paragraph 2 of the Chapter 13 Case Management Order. The parties are at an impasse in attempting to resolve these objections despite all reasonable efforts. The following are: (a.) the parties whose timely objections have not been resolved; (b) their unresolved objections; and (c) the legal and factual issues that must be resolved by the Court in connection with confirmation:

Trustee Objections:
1. Trustee objects to Plan's failure to commit the aggregate dividend provided for by the means test. Response: the OCP will provide for a 100% dividend and adequate funding for same.
2. Trustee requests additional verification of promissory note income. Response: provided.
3. Trustee objections to debtor's valuation of promissory note income as "unknown" in schedule B. Response: the value of debtor's right to payments under a promissory note is, in fact, unknown. At best, the right to payments has nominal value. More importantly, the value to the estate is providing the debtor the ability to fund the plan and produce a dividend for unsecured creditors. Further, Debtor requests a waiver of the objection based on the increase in the dividend to unsecured creditors to 100%.
4. Update as to debtor's employment. Response: the debtor returned to employment in August.
5. Trustee requests verification of charitable expenses and rent expense. Response: provided.
6. Trustee objects to the reasonableness of certain expenses. Response: all expenses are actual, reasonable, and necessary expenses and are within or near the IRS guidelines for such expenses. Further, the OCP commits a 100% dividend.
7. Upon completion of payments to Dort Federal there will be additional disposable income. Response: the OCP will provide for the increase.

8. Failure to disclose sale of property at 76 South Street, Ortonville, MI in the Statement of Financial Affairs. Response: amended.

3. ___ Request an adjournment of the confirmation hearing to ______________, due to the following good cause:

4. ___ Dismiss the case. [The Court will construe this as a motion by the debtor to dismiss the case under Fed.R.Bankr.P. 1017(f)(2), and the Court will enter an order of dismissal and the case will be removed from the docket, unless the case was previously converted from Chapter 7, 11, or 12 to Chapter 13. In that event, a separate motion to dismiss must be filed within 7 days.]

5. ___ Convert the case to chapter 7. [The debtor must promptly file a separate notice of conversion under Fed.R.Bankr.P. 1017(f)(3), and pay the filing fee for such notice. Such notice of conversion will cause the case to be converted without the entry of an order of conversion.]

/s/ Brian D. Rodriguez_____
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